

# **EXHIBIT 7**

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1 time of your last contacts with Mr. Alix?

2 A. Yes.

3 Q. Okay. And you mention in your last

4 answer, are you a thousand percent sure.

5 What -- tell us the rest of that

6 conversation, sir.

7 A. Well, you know, Jay Alix kept coming

8 with the same story over and over again. And I

9 would tell him that our legal counsel is very

10 comfortable with what's happening. And I, you

11 know, wanted to listen, if there was anything

12 new that was coming on. It was the same story.

13 And so, you know, Tom was a new CRO,

14 had some legal training by background as well,

15 and I thought it would just be good. I said,

16 you know, you should take a look. Gordon had

17 before. Gordon was comfortable. You should.

18 That was the nature of it.

19 Q. Now, you mentioned in one of your

20 earlier answers, in OPCO, there were updates, I

21 think you said.

22 And the updates included saying to

23 the OPCO members that Jean was all over it; is

24 that fair?

25 A. Yeah. I guess what I would say on

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1 that is there were lots of issues to talk about

2 in our OPCO. This was not a major issue at

3 all. There were lots of other things that we

4 were dealing with or working on, right?

5 So, you know, I think the point I

6 wanted to make is that Jean Molino, our general

7 counsel, was all over the issues, right,

8 understanding what was going on, what the

9 allegations were and so forth.

10 Q. Okay. Did anyone in OPCO say, in

11 words or substance, well, isn't Ms. Molino

12 someone who was involved in the disclosures

13 that Mr. Alix is complaining about and perhaps

14 we should get an independent look at this?

15 MS. GAY: Objection to form.

16 You may answer.

17 A. You know, I think that we had

18 outside counsel as well as Jean in

19 understanding what our disclosure practices

20 should be.

21 So, you know, we were very

22 comfortable with where Jean was and Jean made

23 that very clear, that there needed to be an

24 external counsel to look at it as well.

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8 Did Mr. Alix, at any time in your

9 meetings, express a sense of urgency with

10 respect to the issues he was raising?

11 A. He was always urgent.

12 Q. Okay. What is the professional

13 standards committee, sir?

14 A. The professional standards committee

15 is a group of senior partners that will

16 evaluate whether a partner is, you know, if

17 they are misbehaving in any particular manner.

18 If someone raises a complaint across the board,

19 they will be investigated by that group and

20 they will make a decision as to whether there's

21 an issue. And if there is an issue, what the

22 sanction is.

23 Q. And can you tell us, in the 2014

24 time frame, who was on that professional

25 standards committee?

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1 A. I can't remember all the particular

2 names. I think Larry Kanarek, Jean-Christophe

3 Mieszala. I can't remember all the names.

4 Q. Now, Jean-Christophe Mieszala, he

5 was also, at one point, the chief risk officer?

6 A. After Tom Barkin left to become a

7 federal reserve governor, Jean-Christophe -- JC

8 became the risk officer.

9 Q. That will make it easier for me,

10 too. Thank you.

11 A. Yeah.

12 Q. So did you speak to JC about the

13 issues that Mr. Alix was raising?

14 A. He was aware of them. Yeah, he was

15 aware. I can't remember having the

16 conversation with him, but he was aware -- of

17 any issues that were out there, he would know.

18 Q. Okay. So, fair to say that Mr. Orr,

19 the chief risk officer in 2014, his successor,

20 Mr. Barkin, and also Mr. Barkin's successor,

21 Mr. Mieszala, all were aware of the issues that

22 Mr. Alix was raising beginning in September of

23 2014.

24 Would that be fair?

25 A. Yeah, I think so. I don't think